

**ETRI**

**Environmental Technology Resources, Inc.**

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**Update Phase I Environmental Site Assessment Report  
for the Property Located at  
1160 Allene Avenue in  
Atlanta, Georgia**

**Prepared For:**

**The Trust for Public Land  
One Georgia Center  
600 West Peachtree Street  
Suite 1840  
Atlanta, Georgia 30308**

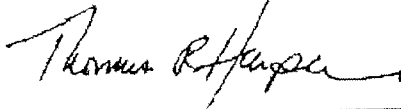
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**February 15, 2009**

THE INFORMATION CONTAINED IN THIS REPORT TITLED:  
"UPDATE PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT FOR THE PROPERTY LOCATED AT  
1160 ALLENE AVENUE IN ATLANTA, GEORGIA"  
IS CONFIDENTIAL AND IS INTENDED FOR THE EXCLUSIVE USE OF  
THE TRUST FOR PUBLIC LAND AND THE CITY OF ATLANTA

DOCUMENT PREPARED BY:

A handwritten signature in black ink, appearing to read "Thomas R. Harper", is written over a horizontal line.

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THOMAS R. HARPER, TECHNICAL DIRECTOR

February 5, 2009

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**1.0 SUMMARY OF FINDINGS**

- The "Site" or "subject property" is located at 1160 Allene Avenue in Atlanta, Fulton County, Georgia. The subject property includes approximately 3.0-acres of land that is developed with an approximate 2,800 square feet office building and a bus maintenance facility. Two additional former automotive service buildings are located on the property. These buildings are in poor condition and no longer functional. Until late 2008, the property was occupied by Harmon Brothers Charter Service which operated busses that are leased for tours and other events.
- Historical research of historical aerial photographs, Sanborn maps and City directories, determined that the subject property was wooded and undeveloped land in 1938. By the late 1940's, the property was developed with a gasoline station on the northwest side of the property and a automotive or truck repair facility on the southern side of the Site. The gasoline station was operational until the mid to late 1950's. In the early 1960's, the property began to be used as a truck terminal and leasing facility. In the early to mid-1980's, the property was used by a limousine company and by a bus company. Harmon Brothers owned and operated the property from 1988 until 2006.
- Inspection of the property identified areas of petroleum impacted soils. The most significant area of petroleum impacted soil is located around the diesel fuel dispenser and other smaller areas around the service garage. Investigations were completed by ETRI in 2006 to define the extent of the soil contamination. ETRI estimated that approximately 48 cubic yards of soil in the area of the dispenser have levels of total petroleum hydrocarbons – diesel range organics at concentrations greater than 100 mg/Kg. A 10,000-gallon underground storage tank is located on the property which was used for the storage and dispensing of diesel fuel. In addition a possible waste oil storage tank is located on the Site. Two pole-mounted transformers are located on the property. None of the transformers are labeled as being non-PCB. There is no visual evidence of any discharges from the transformers.
- The subject property had a 4,000-gallon gasoline, 2,000-gallon gasoline and a 1,000-gallon kerosene underground storage tanks removed in 1998. Soil samples detected the presence of contamination in the area of each of the UST's. The Georgia EPD requested the completion of a Corrective Action Plan Part A which was prepared and submitted to the Georgia EPD on April 5, 2006. Three monitoring wells were installed as part of the CAP Part A. Groundwater was determined to be located at a depth of 16 to 31 feet below ground surface. Low concentrations of Benzene were detected in two monitoring wells located to the east and west of the shop area. No polynuclear aromatic hydrocarbons were detected in any of the monitoring wells. Based on the results of the groundwater investigations, the Georgia EPD issued a no

further action letter for the tank closure.

- The regulatory agency records search identified one state hazardous waste site, twelve non-Hazardous Site Inventory sites within one-mile, nine LUST sites, three CERCLIS sites and one Brownfield's site within one-half mile, three registered UST sites and one conditionally exempt and six non-generators within one-quarter mile of the subject property. The state hazardous waste site is a former battery manufacturing facility and lead contaminated soils were discovered at depths of up to four feet below ground surface. No groundwater investigations have been completed at this site. The subject property is also a non-hazardous site inventory site. Environmental investigations that were conducted on this property in 2006 discovered groundwater with detectable concentrations of Cyclohexane, Methylcyclohexane and Chloroform. The release was reported to the Georgia Environmental Protection Division (EPD) in February 2007. In a letter dated April 17, 2007, the Georgia EPD determined that the release did not exceed a reportable quantity and did not place the property on the Hazardous Site Inventory. Various volatile organic compounds were detected in groundwater at the closest non-HSI site. The potential of an impact from this site is moderate as it is located up gradient. The other closest non-HSI sites detected heavy metals in soils and minimal groundwater contamination. Based on the determined or presumed direction of groundwater flow, the potential of an impact from these other non-HSI sites is low. A review of file information from the other LUST sites determined that the potential for an impact on the subject property would be low. Orphan sites that were identified include one state hazardous waste site (HSI), state hazardous waste site (HSI), one non-HSI site, two Brownfield's sites, eleven (11) solid waste landfills and five ERNS sites were identified as orphan sites. Based on their locations, the probability of an impact from the orphan sites is low.
- The adjacent properties include a telecommunications operations building, vacant warehouse building, a towing company, vacant office-warehouse building an automotive service facility, a former tire re-treading facility and single-family homes. Given the current and past use of the adjacent properties, the probability of an impact to the subject property is low to moderate.
- Existing groundwater monitoring wells from the investigations completed as part of the tank closure were sampled for volatile organic compounds. The results of the analyses determined that groundwater in one of the monitoring wells contain Cyclohexane, Isopropylbenzene and Methylcyclohexane. Groundwater in another monitoring well was found to contain Chloroform. Previous findings from groundwater testing were reported to the Georgia EPD. The presence of Isopropylbenzene in groundwater, which was previously not detected, may require reporting to the Georgia EPD. Petroleum products are exempt from reporting under the Hazardous Sites Response Act (HSRA). Isopropylbenzene originates from petroleum refining and is likely a constituent in petroleum fuels.
- The presence of petroleum impacted soil in the area of the fuel dispenser and other areas of the property along with the groundwater contamination detected in groundwater samples, constitute historical recognized environmental conditions on this property. The impacted soils should be excavated and properly disposed. The underground storage tank system should be properly closed in accordance with Georgia Underground Storage Tank Management Program requirements.

ESB  
lead  
site



property or from public access areas. Photographs were taken to document the features observed during the reconnaissance and environmental conditions of concern (if any), where possible. Copies of the photographs relevant to the information included in this report are included in Appendix A.

### 2.3.2 Interviews

Interviews were conducted with persons as noted in the following table. Pertinent information reported by the interviewed parties is discussed in appropriate sections of the report.

<i>Name</i>	<i>Function/Title</i>	<i>Company</i>	<i>Date</i>	<i>Phone</i>
Ms. Kia Ball	Project Manager	The Trust for Public Land	January 29, 2009	404-873-7306

### 2.3.3 Environmental Regulatory Database Information

Information for the standard federal, State, and local environmental record sources specified in ASTM Standards was obtained through Environmental Data Resources, Inc. (EDR) of Milford, Connecticut. The subject site is not located in or near tribal lands. The database information was reviewed to help identify evidence of recognized environmental conditions in connection with the subject property. Unmappable (orphan) sites listed in the database with insufficient addresses or geocoding information to be mapped were evaluated for potential location within the approximate minimum search distance. A copy of the EDR Database Search including a description of the databases is included in Appendix B of this report.

### 2.3.4 Historical Use Information

A history of the previous uses of the subject property and properties in the surrounding area, to the extent that this information was revealed in the course of researching the subject property, was developed consistent with practices specified in the ASTM Standards. From the specified standard historical sources, ETRI reviewed those sources listed below. Copies of representative historical source information are provided in applicable appendices.

- Aerial photographs were searched at approximate five year intervals from 1938 to 2002. Available aerial photographs dated 1938, 1960, 1972 and 1986 were obtained from the University of Georgia Science Library. Aerial photographs dated 1993 and 2002 were obtained online from [www.TerraServerUSA.com](http://www.TerraServerUSA.com). An aerial photograph dated 2006 was obtained from [www.freshlogicstudios.com](http://www.freshlogicstudios.com).
- A historic USGS topographic map dated 1973 were researched at the University of Georgia Science Library in Athens, Georgia.
- Interviews were conducted with persons listed in Section 2.3.2.
- A historic Sanborn maps dated 1932 was obtained from the Atlanta History Center in Atlanta, Georgia.
- A search of City Directories was conducted at the Atlanta History Center in Atlanta, Georgia. City directories were searched at approximate five year intervals from 1919 to 2007-2008.
- U.S. EPA and Georgia EPD environmental databases were searched.

Historical information sources researched in this assessment allowed uses of the subject property to be traced from the present back to 1938. In 1938, the subject property was wooded and undeveloped. By the late 1940's, the property was developed with a gasoline station on the northwest side of the property and an automotive or truck repair facility on the southern side of the Site. The gasoline station was operational until the mid to late 1950's. In the early 1960's, the property began to be used as a truck terminal and leasing facility. In the early to mid-1980's, the property was used by a limousine company and by a bus company. Harmon Brothers owned the property and operated a charter bus service and maintenance facility since 1988.

### 2.3.5 Title Records/Environmental Lien Information

A chain of title search was not requested as part of this project, therefore this report has been prepared without this information. In addition, no information regarding environmental liens was provided to ETRI.

### 2.3.6 Historical City Directories

City directories, which list property tenants by street address, are typically reviewed to identify past Site occupants. A search was conducted for City or Suburban directories at the Atlanta History Center in Atlanta, Georgia. The following is a listing of the city directories for the subject and adjoining properties. Listings for the subject property are highlighted in bold.

Site Address: 1150/1160 Allene Avenue

Year	Address
1919	72 Allene Avenue - Residential 83 Allene Avenue - Residential
1925	249 Allene Avenue - Aycock Brothers Coal 250 Allene Avenue - National Oil Company
1930	1147 Allene Avenue - Residential 1187 Allene Avenue - Aycock Bros. Coal 1194 Allene Avenue - National Oil Company
1935	1147 Allene Avenue - Residential 1187 Allene Avenue - Aycock Bros. Coal 1194 Allene Avenue - National Oil Company
1945	1147 Allene Avenue - Residential 1180 Allene Avenue - Claude Mason Tire Co. 1187 Allene Avenue - Aycock Bros. Coal 1194 Allene Avenue - National Oil Company
1950	1147 Allene Avenue - Residential <b>1150 Allene Avenue - Scott's Service Station, Kimbrow Transfer Co.</b> 1151 Allene Avenue - Ivey Auto Repair <b>1160 Allene Avenue - Dixon Inc. (Garage)</b>

	1164 - Allene Avenue - Jackson Mfg. Co - Concrete Products. 1187 Allene Avenue - Capital View Coal Co. 1194 Allene Avenue - National Oil Company
1955	1147 Allene Avenue - Residential <b>1150 Allene Avenue - Sexton Bros. Service Station</b> 1151 Allene Avenue - J. Manning Auto Repair <b>1158 Allene Avenue - Edwards Truck Service</b> <b>1160 Allene Avenue - C.P. Strong, Inc.</b> 1164 - Allene Avenue - Jobson Mfg. Co - Concrete Products. 1194 Allene Avenue - National Oil Company
1961	1147 Allene Avenue - Residential <b>1150 Allene Avenue - Mac's Truck Terminal</b> 1151 Allene Avenue - Continental Truck Leasing <b>1158 Allene Avenue - Acme Leasing Co.</b> <b>1160 Allene Avenue - Shellnut Transfer, Supreme Truck Leasing</b> 1194 Allene Avenue - AM Mineral Spirits Co.
1966	1147 Allene Avenue - Residential <b>1150 Allene Avenue - Capitol Truck Rentals</b> 1151 Allene Avenue - Continental Truck Leasing <b>1158 Allene Avenue - George's Pick-up &amp; Delivery</b> <b>1160 Allene Avenue - Supreme Truck Leasing</b> 1194 Allene Avenue - Globe Solvent Co.
1971	1147 Allene Avenue - Vacant <b>1150 Allene Avenue - Worley Transfer, Inc., George's Pick-up &amp; Delivery</b> 1151 Allene Avenue - Continental Truck Leasing <b>1160 Allene Avenue - Supreme Truck Leasing</b> 1210 Allene Avenue - Gas, Inc.
1976	1141 Allene Avenue - Specialty Services <b>1150 Allene Avenue - Transport Services</b> 1151 Allene Avenue - Vacant <b>1160 Allene Avenue - Supreme Truck Leasing</b> 1210 Allene Avenue - Gas, Inc.
1981	1141 Allene Avenue - Specialty Services 1151 Allene Avenue - Vacant <b>1160 Allene Avenue - Atlanta Limousine Services</b> 1210 Allene Avenue - Gas, Inc.
1986	1141 Allene Avenue - Specialty Services - Truck Welders, Reliable Hydraulics 1151 Allene Avenue - Vacant <b>1160 Allene Avenue - Atlanta Limousine Services, North Georgia Bus Links</b>

	1210 Allene Avenue - Cab Atlanta
1991	1141 Allene Avenue - Specialty Services - Truck Welders, Reliable Hydraulics 1151 Allene Avenue - DJ's Custom Car Garage <b>1160 Allene Avenue - Harmon Brothers Charter Bus Service</b> 1210 Allene Avenue - Cab Lift Atlanta - Hydraulic Lifts
1996	1092 Allene Avenue - No Listing <b>1160 Allene Avenue - Harmon Brothers Charter Inc.</b>
1999	1092 Allene Avenue - R. Owens 1135 Allene Avenue - Maxi's Complete Auto Touring <b>1160 Allene Avenue - Harmon Brothers Charter Inc.</b>
2004-2005	1092 Allene Avenue - No Return 1135 Allene Avenue - No Return <b>1160 Allene Avenue - Harmon Brothers Charter Inc.</b> 1190 Allene Avenue - Sprint Telecommunications

### 2.3.7 Previous Environmental Reports

ETRI completed previous environmental assessments of the subject property. In 2006, ETRI completed a Phase I and limited Phase II ESA on behalf of The Trust for Public Land. ETRI prepared a report titled: *Phase I and Limited Phase II Environmental Site Assessment Report for the Property Located at 1160 Allene Avenue in Atlanta, Georgia* and dated September 6, 2009. ETRI also completed an asbestos survey of the existing buildings. An asbestos inspection letter report was presented to TPL on September 6, 2006.

### 2.3.8 Data Gaps

According to § 3.3.20 of ASTM Standard E 1527-05 a data gap is a lack of or inability to obtain information required by the ASTM Standard despite good faith efforts to gather same. Data gaps may result from incompleteness in any of the activities required by the by the ASTM Standard. The following data gaps occurred in connection with this report:

Data Gap	Explanation	Significance of Gap
Site History	Site history not conducted in 5-year intervals (See § 4)	Low - not likely to alter Report's conclusions due to ETRI's search of standard historical sources of information such as aerial photographs, historic topographic maps, city directory abstracts, Sanborn Fire Insurance Maps, reviews of previous investigations and interviews with knowledgeable individuals who were familiar with the property.

### **2.3.9 ASTM Non-Scope Services and Other Resources**

Issues beyond the scope of the ASTM Standards are described in Section 7.0 of this report. Other resources and information accessed for purposes of this site assessment are discussed in appropriate sections of the report. Credentials of the environmental professional responsible for preparation of this report are included in Appendix C.

### **2.3.10 Limitations and Exceptions of Assessment**

Along with all of the limitations set forth in various sections of the ASTM Standards, the accuracy and completeness of this report is necessarily limited by the following:

- Chain of ownership records were not provided to ETRI.
- Environmental lien information was not provided to ETRI.

### **3.0 PROPERTY DESCRIPTION AND PHYSICAL SETTINGS**

#### **3.1 Location and Legal Description**

##### **3.1.1 Site Location**

The subject property is located in Land Lot 106 of the 14<sup>th</sup> District of Fulton County, Georgia. The property is located in the Oakland City area within the City limits of Atlanta. The Site is located approximately 2.4 miles southwest of the central business district of the City of Atlanta. Interstate 75/85 is located approximately 1.1-miles to the east and Interstate 20 is located approximately 1.2 miles to the north. A Site Location Map, Figure 1 identifies the location of the subject property relative to these landmarks.

##### **3.1.2 Property Boundaries**

ETRI was not provided with a property boundary map of the Site. According to the legal description, the subject property is an irregular shaped tract of land with approximately 606.51 feet of frontage along Allene Avenue. The northern property boundary is approximately 104.7 feet, the eastern-northeastern boundary is approximately 801.72 feet and the southern boundary is approximately 383.02 feet. This property includes approximately 3.0-acres of land that has been developed with an office building and bus maintenance-repair shop. A copy of the legal description is included in Appendix E.

#### **3.2 Property and Vicinity Characteristics**

The subject property includes approximately 3.0-acres of land that is developed with an approximate 2,800 square feet office building and a bus maintenance facility that includes two drive-through bays. Two additional former automotive service buildings are located on the property. Until November 2008, the property was occupied by Harmon Brothers Charter Service which operated a bus leasing and servicing facility at this location. Surrounding properties include a telecommunications operations building, vacant warehouse building, a towing company, vacant office-warehouse building and an automotive service facility.

#### **3.3 Description of Property and Current Use**

The subject property is developed with an approximate 2,800 square feet office building and a two-bay drive through bus maintenance facility. The office building is a concrete block building constructed on a concrete slab. The front (west) side of the building is finished with a brick exterior. The building has a flat roof supported by steel or wood trusses.

The interior of the building is finished with wood panel and sheet rock walls, suspended ceilings and 9-inch by 9-inch and 12-inch by 12-inch vinyl floor tile. The office area is illuminated with fluorescent light fixtures.

The bus service facility is a concrete block structure constructed in the early 1940's. The structure has a flat roof with wood trusses and wood decking. The building has two drive-through service bays. One of the service bays has a pit for servicing vehicles. Each service bay has a roll-up garage door to

### 3.4.3 Soils

Information on the soil type present on the subject property was obtained from the *Soil Survey of Fulton County, Georgia*, issued in 1958. According to the United States Soil Conservation Service maps for Fulton County, the predominant soil located on the Site is Cecil-Urban Land complex, 2 to 10 percent slopes, eroded (CuC). The Cecil series consists of very deep, well drained, moderately permeable soils that have developed from weathered gneiss, granite, and schist. They are typically found on ridges and side slopes of the Piedmont uplands and are deep to saprolite and very deep to bedrock. They form in residuum weathered from felsic igneous and high-grade metamorphic rocks of the Piedmont uplands. These soils are well drained, have medium to rapid runoff, and exhibit moderate permeability. Urban Land soils have been so altered or obscured by urban works and structures that identifying and mapping the soils is not feasible or would be of no value to the agricultural community of the county.

### 3.4.4 Geology/Hydrogeology

The Site is located in Georgia's Southern Piedmont Physiographic Province. Geographically, the Piedmont is a terrain of metamorphosed and deformed rocks ranging in age from late Precambrian to early Paleozoic. Most of the rock in the Piedmont is metamorphic, and includes gneisses, schists, and meta-volcanics; however, there are localized outcrops of granitic rocks that can cover large areas (e.g., Stone Mountain). When weathered, these rocks form a reddish-brown soil (residuum) of consisting of various ratios of sand, silt, and clay. This material is called saprolite when the structural features of the parent rock (such as foliation and schistosity) are retained. Because of slow erosion rates within the Piedmont during recent geologic time, residuum/saprolite can be as much as 100 feet thick beneath major topographic features.

According to the *Geology of the Greater Atlanta Region, 1984*, the Site is underlain by the Norcross Gneiss formation of the Atlanta Group. The Norcross Gneiss formation includes light-gray epidote-biotite-muscovite-plagioclase-gneiss locally containing amphibolite. No rock outcrops were noted during the Site inspection.

### 3.4.5 Groundwater

Groundwater in the uppermost aquifer in the Southern Piedmont Province typically occurs under unconfined conditions in the pore spaces of the shallow soils, and is usually encountered within several feet to upwards of 30 to 40 feet below existing ground surfaces. The top of the water table generally mimics the original topography of the ground surface. Groundwater flows from highlands to lowlands, discharging into streams or wetlands. Based on information obtained during groundwater sampling that was completed as part of this assessment, groundwater was determined to be located at a depth of 21.46 feet to 33.77 feet below ground surface. Previous investigations determined that the direction of groundwater flow was determined to be to the east-northeast.

### 3.4.6 Floodplains and Wetlands

ETRI obtained a Flood Insurance Rate Map to determine whether any part of the subject property is located within the floodplain. ETRI obtained a floodplain map prepared by the Federal Emergency Management Agency (FEMA) to determine whether the Site is in a floodplain. As can be seen by the

FEMA map, no areas of the subject property are located within the 100-year floodplain. A copy of the FEMA map is included in Figure 4.

Section 404 of the Clean Water Act requires the U.S. Army Corps of Engineers (ACOE) to regulate most discharges of dredge or fill material into waters of the U.S., including wetlands. The phrase "discharges of dredge or fill material" essentially includes all land disturbing activities accomplished by use of mechanized equipment. Waters of the U.S. includes most waterways (i.e., intermittent or perennial streams/creeks, rivers, tributaries, etc.), water bodies (i.e., ponds, lakes, etc.), and wetlands. The ACOE 1987 Wetlands Delineation Manual is the legally mandated system for identifying Section 404 jurisdictional wetlands, and is based upon satisfying three criteria of hydrophytic vegetation, hydric soils, and wetland hydrology. Generally, areas must possess field evidence of all three parameters in order to be designated as jurisdictional wetlands.

According to the 1990 National Wetlands Inventory Map, Southwest Atlanta Quadrangle, no areas of the subject property are considered to be jurisdictional wetlands. A copy of the wetlands map is included as Figure 5.

#### **3.4.7 Radon**

Radon gas can become a health hazard if allowed to build up in unventilated areas such as basements and crawl spaces. Fulton County is located in a Radon Zone Level 1. Zone 1 has a predicted average indoor screening level of greater than 4 Pico Curies per liter (pCi/L). The EPA action level for radon is 4 pCi/L. The only way to accurately obtain site-specific information is to test for radon. If elevated levels of radon were discovered, additional ventilation could be installed to minimize hazards associated with radon.



## 4.0 PROPERTY USAGE

### 4.1 Current Uses of the Property

Current use of the subject property as determined through observation and records review is described below.

The subject property is developed with an approximate 2,800 square feet office building and a bus maintenance facility. Two additional former automotive service buildings are located on the property. Until late 2008, the property was occupied by Harmon Brothers Charter Service which operated busses that are leased for tours and other events. Photographs of the subject property are provided in Appendix A. Section 6.0 of this report provides additional Site reconnaissance details.

### 4.2 Past Uses of the Subject Property and Adjoining Properties

According to a review of historic topographic maps, aerial photographs, tax assessor records, interviews and city directories, the subject property was wooded and undeveloped land in 1938. By the late 1940's, the property was developed with a gasoline station on the northwest side of the property and a automotive or truck repair facility on the southern side of the Site. The gasoline station was operational until the mid to late 1950's. In the early 1960's, the property began to be used as a truck terminal and leasing facility. In the early to mid-1980's, the property was used by a limousine company and by a bus company. Harmon Brothers owned and operated the property from 1988 until 2006. Historical Sanborn and topographic maps and aerial photographs of the Site are located in Appendix E.

<i>Years</i>	<i>Property Use</i>	<i>Reference Source</i>
1932-1946	The 1932-1946 Sanborn map indicates that the subject property was developed with several buildings. Two buildings were located on the north side of the property. The larger building was used as a truck repair facility. The specific use of the second building is not known. A building located on the southwest side of the property was used as an Auto Repair facility. The adjacent property to the southeast was developed with concrete block buildings whose specific use cannot be identified. National Oil Company operated a facility to the south. Gasoline tanks used by the National Oil Company were located near the southern side of the subject property. The property located at 1150 Allene Avenue was used as a gasoline station. This property may have been on the northern side of the subject property. A gasoline tank is noted near Allene Avenue.	1932-1946 Sanborn map
1938	A 1938 aerial photograph indicates that the subject property was wooded and undeveloped. Allene Avenue was constructed and formed the western property boundary. The rail line that borders the subject property to the east had also been	1938 Aerial photograph

	constructed. Several manufacturing-warehouse buildings were located along Woodrow Street to the west. Land use in the area was a mix of residential and commercial-industrial.	
1950	The 1950 City directories indicated that Scott's Service Station and Kimbro Transfer operated at 1150 Allene Avenue. Dixon Garage operated at 1160 Allene Avenue.	1950 City directories
1955	The 1955 aerial photograph indicates that the office and bus maintenance buildings were constructed. At least one additional building was located on the north side of the property. City directories indicated that Sexton Brothers Service station operated at 1150 Allene Avenue, Edwards Truck Service at 1158 Allene Avenue and C.P. Stone at 1160 Allene Avenue. Adjacent properties were developed with commercial buildings.	1955 Aerial photograph and City directories
1960	At least four buildings can be seen on the subject property in the 1960 aerial photograph. The structures that were constructed at that time included the existing office and bus maintenance buildings. City directories indicated that Macs Truck Terminal was located at 1150 Allene Avenue, Acme Leasing at 1158 Allene Avenue and Shellnut Transfer Supreme Truck Leasing at 1160 Allene Avenue.	1960 Aerial photograph
1972	The 1972 aerial photograph continues to show the buildings on the subject property. No significant changes can be seen on adjacent properties.	1972 Aerial photograph
1973	A 1973 topographic map does not identify any structures on the subject or adjacent properties.	1954 (photo-revised 1973) topographic map
1978	This aerial photograph shows several trucks on the northern side of the property. The bus maintenance facility and office building are shown as they exist today. The 1976 City directories included that Transport Service Supreme was the occupant in the building. The adjacent property to the south appears to be cleared and undeveloped.	1978 Aerial Photograph, 1976 City directories
1986	No significant changes can be seen on the subject property in the 1986 aerial photograph. The rail line can be seen adjacent to the east-northeast. North Georgia Bus Lines was the occupant on the property.	1986 Aerial photograph, 1986 City directories
1988	According to Clint Harmon of Harmon Brothers Charter Service, they began operations on the property in 1988.	Interviews
1993	The 1993 aerial photograph is a larger scale than earlier aerial	1993 Aerial photograph

	<p>photographs and shows more details on the property. Two buildings were located on the northern side of the property. Several busses were parked on the northwestern side of the property and south of the two buildings. The office and bus maintenance buildings can be seen on the southern side of the property. Busses were also parked on the southeastern side of the Site. The building located to the east-southeast had been demolished. The adjacent property to the south had been developed with a commercial building.</p>	
2002	<p>The 2002 aerial photograph indicates that the two buildings on the northern side of the property had been demolished. Land along the eastern side of the property had been cleared and was now used to park busses. Busses were also being parked on the northeastern side of the Site. Harmon Brothers was the occupant on the property in 2002. The commercial building on the adjacent property to the south had been expanded.</p>	2002 Aerial photograph
2006	<p>The 2006 aerial photograph shows the office and bus service buildings as well as the abandoned service buildings. Busses are parked on the east and northern sides of the property. By February 2009, Harmon Brothers had vacated the property. The offices were emptied as well as the bus service building. All vehicles had also been removed from the property.</p>	2006 Aerial photograph and ETRI's February 5, 2009 site reconnaissance

#### 4.5 INTERVIEWS

ETRI interviewed Mr. Clint Harmon, owner of the Harmon Brothers Charter Service regarding his knowledge of the properties history. Mr. Harmon has operated his business at this location for the past 18 years. According to Mr. Harmon, a bus service company operated at this location prior to Harmon Brothers taking occupancy. He purchased the property from a Mr. Brumbelow but he could not recall the name of his company or whether it is in existence. Mr. Harmon was not aware of any hazardous materials spills since they have been in operation on this property.

## 5.0 ENVIRONMENTAL REGULATORY RECORDS REVIEW

### 5.1 Standard Federal and State Environmental Record Sources

The numbers of listed sites identified within the approximate minimum search distance from federal and state environmental records database listings specified in the ASTM Standards are summarized in the following table. Detailed information for sites identified is provided in Section 5.2 along with an opinion about the significance of the listing with regards to recognized environmental conditions in connection with the subject property. A copy of the EDR database search report which includes a description of the databases is included in Appendix B of this report.

<i>Standard Federal and State Environmental Database Record Summary</i>						
<i>Database Record</i>	<i>Search Distance (miles)</i>		<i>Total Sites Found</i>	<i>On Subject Site</i>	<i>Distance to Listed Site (miles)</i>	<i>Data Source</i>
	<i>Standard</i>	<i>Actual</i>				
Federal NPL List	1.0	1.0	0	No	NA	EDR
Federal CERCLIS List	0.5	0.5	3	No	< 0.125 – 0.5	EDR
Federal CERCLIS - NFRAP List	0.5	0.5	0	No	NA	EDR
Federal RCRA CORRACTS Facilities List	1.0	1.0	0	No	NA	EDR
Federal RCRIS TSD Facilities List	0.5	0.5	0	No	NA	EDR
Federal RCRIS Large Quantity Generators List	0.25	0.25	0	No	NA	EDR
Federal RCRIS Small Quantity Generators List	0.25	0.25	1	No	<0.125	EDR
Federal ERNS List	Subject Property	Subject Property	0	No	NA	EDR
Federal TRIS List	Subject Property	Subject Property	0	No	NA	EDR

<i>Standard Federal and State Environmental Database Record Summary</i>						
<i>Database Record</i>	<i>Search Distance (miles)</i>		<i>Total Sites Found</i>	<i>On Subject Site</i>	<i>Distance to Listed Site (miles)</i>	<i>Data Source</i>
	<i>Standard</i>	<i>Actual</i>				
State Landfill and/or Solid Waste Disposal Site List	0.5	0.5	0	No	0.125 – 0.25	EDR
State Hazardous Waste List	1.0	1.0	1	No	0.125 – 0.25	EDR
State Leaking Underground Storage Tank List	0.5	0.5	10	Yes	<0.125 – 0.5	EDR
State Registered Underground Storage Tank List	0.25	0.25	3	Yes	<0.125 – 0.25	EDR
GA Spills	Subject Property	Subject Property	0	No	NA	EDR
GA Non-Hazardous Site Inventory	1.0	1.0	12	Yes	0.125 – 1	EDR
Brownfield's	0.5	0.5	1	No	0.25 – 0.5	EDR
Institutional Controls	Subject Property	0.5	0	No	NA	EDR
Department of Defense	1.0	1.0	1	No	0.5 – 1.0	EDR

NA = Not Applicable

## 5.2 Discussion of Database Findings

### 5.2.1 CERCLIS Sites

The U.S. EPA maintains a list of federal CERCLIS sites. The EPA has created the National Priorities List (NPL) which is a list of abandoned sites which may require remedial investigation, feasibility studies, and possibly remedial activities. The sites with the highest priority ranking are classified as active Superfund sites. CERCLIS is a computer database which lists both inactive and active sites which have been inspected by EPA or its designees for possible violation of RCRA or CERCLA regulations. The search encompasses a one-half mile radius for CERCLIS facilities. Three CERCLIS facilities were identified within 0.5-mile. The following identifies the names and locations of the CERCLIS sites identified:

*EPA  
Lead  
Cleanup*

Name of Facility	Address	Distance, Location	Topographic Position
J&W Pallet & Drums Co.	1121 Allene Avenue	333 feet, north	Up gradient
ESB, Inc.	1214 Allene Avenue	505 feet, south	Down gradient
Superior Sealants	1135-9 Sylvan Road	1,402 feet, west-northwest	Cross gradient

The J&W Pallet & Drum Company facility is located less than 1/8 mile to the north. This facility is also listed as a small quantity generator. According to the database report, a preliminary assessment was completed on August 12, 2005. Based on the results of the preliminary assessment, no further remedial actions are planned. The J&W Pallet & Drum facility is not listed on other databases which list facilities that have confirmed releases of hazardous materials or petroleum products.

The ESB, Inc. CERCLIS site is the former Exide Battery Manufacturing facility. ESB is located less than 1/8 mile to the south. According to the database report, a preliminary assessment was completed in 1985 and an integrated assessment was conducted in 1993. Removal negotiations were initiated in 2003. This facility has been found to contain elevated concentrations of lead in soils to a depth of four feet. No groundwater investigations have been initiated to-date.

The Superior Sealants facility is located between 0.25 and 0.5-mile to the west-northwest. Superior Sealants is also listed as a small quantity generator. A preliminary assessment of this site was completed in 1985. In November 2001, an emergency removal action was conducted at the site. The Superior Sealants property is not listed on other databases which list facilities that have confirmed releases of hazardous materials or petroleum products.

### 5.2.2 Federal RCRIS Small Quantity Generator List

The RCRA database is maintained by the U.S. EPA and lists facilities that have given notification of hazardous waste activity. Notifiers may engage in the generation, transportation, treatment, storage, and/or disposal of hazardous waste. There are three categories of hazardous waste generators:

- Generators of no more than 100 kg per month, known as conditionally exempt small quantity generators.
- Generators of between 100 and 1,000 kg per month, known as small quantity generators.
- Generators of 1,000 kg or more in a month, known as large quantity generators.
- Non-generators no longer generate hazardous wastes.

Facilities that treat, store, or dispose of hazardous waste are identified as TSDFs. The search for large and small quantity generators of hazardous waste encompassed a 0.25-mile radius of the subject property. No large quantity generators or TSDFs were identified within 0.25 miles of the Site. Six non-generators and one conditionally exempt small quantity generators were identified within 0.25-mile and are listed in the table below.

Name of Facility	Address	Distance, Location	Topographic Position
J&W Pallet & Drum Co. (Non-Generator)	1121 Allene Avenue	333 feet, north	Up gradient
Cab Lift Atlanta (Non-Generator)	1210 Allene Avenue	473 feet, south	Down gradient
ESB, Inc. (Conditionally Exempt Small Quantity Generator)	1246 Allene Avenue	505 feet, south	Down gradient
Debra Warner (Non-generator)	1225 Allene Avenue	702 feet, south-southeast	Down gradient
Champion International (Non-generator)	840 Woodrow Street	715 feet, west-northwest	Cross gradient
Cadillac Products (Non-generator)	840 Woodrow Street	715 feet, west-northwest	Cross gradient
JW Oil (Non-generator)	841 Woodrow Street	715 feet, west-northwest	Cross gradient

J&W Pallet & Drums, ESB, Inc. and Superior Sealants are also listed as CERCLIS sites. ESB, Inc. is also a state hazardous waste site. Champion International was identified on the non-hazardous site inventory. Cadillac Products was identified as having several compliance violations. The violations were related to pre-transport, recordkeeping and contingency plan requirements. No documented releases of hazardous materials were identified at this facility. The probability of an environmental impact from these small quantity generators would be low.

### 5.2.3 State Hazardous Waste Sites (SHWS)

The Georgia Department of Natural Resources, Hazardous Response Division, maintains a database of sites known as the Georgia Hazardous Waste Sites or Hazardous Sites Inventory (HSI), which is a comprehensive listing of those facilities, which are deemed as a hazard to the public health and welfare. The search for HSI facilities encompassed a one-mile search distance of the subject property. ESB, Inc., which is located at 1246 Allene Avenue, was identified on the HSI database. ESB is located approximately 882 feet, south-southeast of the subject property. This facility had a known release of Lead in soil at levels exceeding the reportable quantity. This property is the former Exide Battery facility which manufactured lead-acid batteries from 1948 until 1982. Soil investigations have detected the presence of Lead at concentrations up to 94,000 mg/Kg. Investigations were completed in 2005 and a report was issued to the Georgia EPD on March 7, 2005. On the north yard of this facility, Lead was detected in soils at concentrations up to 53,000 mg/Kg. The impacted soils were found to be to a depth of four feet below ground surface. No groundwater investigations have been initiated at this site. Given its down gradient location, the potential for the ESB facility to have an impact on the subject property is low.

#### 5.2.4 Non-Hazardous Site Inventory

The Georgia EPD has a database of non-Hazardous Site Inventory (non-HSI), which are sites that did not meet criteria to be included in the Hazardous Site Inventory. Contamination at these sites did not meet thresholds for listing on the HSI but are known to be contaminated with hazardous substances. The search for non-HSI sites included properties within a 1.0-mile radius. Fourteen non-HSI sites were identified within 1.0-mile of the Site.

Facility Name	Address	Location Relative to Site	Topographic Relationship
Champion International Corp.	840 Woodrow Street	715 feet, west-northwest	Up gradient
Champion International Corp.	840 Woodrow Street	720 feet, west-northwest	Up gradient
Superior Associates	1135 Sylvan Road	1,402 feet, west-northwest	Up gradient
Former Bernstein Scrap Metals	1066 Murphy Avenue	1,755 feet, northwest	Cross gradient
Former Bernstein Scrap Metals	1006 Murphy Avenue	1,755 feet, north-northwest	Cross gradient
Former C&R Motors	1318 Sylvan Avenue	2,037 feet, southwest	Down gradient
Recycling Industries of Atlanta	972 Avon Avenue	2,078 feet, west	Up gradient
IRCC of Georgia (formerly Puritan Chemical)	916 Ashby Street	2,737 feet, north-northwest	Cross gradient
McGean-Rohco, Inc.	1314 Murphy Avenue	3,485 feet, west-southwest	Cross gradient
Pittsburgh Civic League Apartments.	455 Rockwell Street	4,590 feet, northeast	Down gradient
J&B Smith Company	690 Humphries Street	5,238 feet, north-northeast	Down gradient

In addition to the above referenced sites, the subject property is also a non-hazardous site inventory site. Environmental investigations that were conducted on this property in 2006 discovered groundwater with detectable concentrations of Cyclohexane, Methylcyclohexane and Chloroform. The



presence of Cyclohexane and Chloroform in groundwater exceeds background concentrations and notification is required under HSRA. The release was reported to the Georgia EPD in February 2007.

In a letter dated April 17, 2007, the Georgia EPD determined that a release exceeding a reportable quantity had not occurred and the property would not be placed on the Hazardous Site Inventory. A copy of the non-listing letter from the EPD is included in Appendix F.

ETRI reviewed the files for those non-HSI sites located within 0.5-mile at the Georgia EPD – Hazardous Site Response Program offices.

The Champion International site had 15 underground storage tanks removed in 1987. The UST's were used to store various solvents and mineral spirits. Investigations that were conducted detected the presence of Acetone in groundwater up to 42 mg/L, Benzene to 5.2 mg/L, Chloroform to 20 ug/L, 1,2-Dichloroethene to 4.7 mg/L, 1,2-Dichloroethene to 620 ug/L and Tetrachloroethene to 18 ug/L. A release notification was submitted to the Georgia EPD on October 8, 1997. The Georgia EPD evaluated the release using the Reportable Quantity Screening Method (RQSM). The RQSM on-site (soils) pathway score was determined to be 18.5 and the groundwater pathway score was 6.5. The RQSM thresholds for including a site on the Hazardous Site Inventory are ten (10) for the groundwater pathway and twenty (20) for the on-site or soils pathway. Given the concentrations of contaminants detected in groundwater and the up gradient topographic relationship, the potential for an impact from the Champions site on the subject property is moderate.

The Superior Associates site had a reported release of Bis (2-ethylhexyl) phthalate reported to the EPD in November 1995. Copper and Zinc were also detected in groundwater at concentrations of 0.02 mg/L and 0.12 mg/L. Lead and three semivolatile organic compounds were also detected in surface soils. The concentration of Lead detected was as high as 3,500 mg/Kg. Chrysene was detected at 11 mg/Kg, Benzoanthracene was detected at 11 mg/Kg and Benzo (k) fluoranthene was detected at 16 mg/Kg. The direction of groundwater flow was determined to be to the southeast. Based on the location of the Superior Associates site, the potential for an impact on the subject property is low.

The former Bernstein Scrap Metal facility at 1066 Murphy Avenue reported a release of Trichlorofluoromethane to the EPD on May 12, 2006. The file for this release notification was not available for review. However, given the volatility of the chemical released and its cross gradient topographic relationship, the potential for an impact on the subject property is low.

The Bernstein Scrap Metal site submitted a release notification to the Georgia EPD on October 4, 2001. Contaminants that were detected in groundwater included Acenaphthene, Barium, Bis (2-ethylhexyl) phthalate, Chromium and Lead. Lead was the only contaminant detected above its EPA Maximum Contaminant Level (MCL). Lead was detected at a concentration of 0.027 mg/L. The Georgia EPD evaluated the release using the Reportable Quantity Screening Method (RQSM). The RQSM on-site (soils) pathway score was determined to be zero (0) and the groundwater pathway score was 8.18. The RQSM thresholds for including a site on the Hazardous Site Inventory are ten (10) for the groundwater pathway and twenty (20) for the on-site or soils pathway. Given its cross gradient topographic relationship, the potential for an impact on the subject property is low.

The former C&R Motors site discovered a release of Cumene and Tetrachloroethene. The release was reported to the Georgia EPD in August 2007. The Georgia EPD evaluated the release using the

Reportable Quantity Screening Method (RQSM). The RQSM on-site (soils) pathway score was determined to be zero (0) and the groundwater pathway score was 8.54. Given the properties down gradient topographic relationship, the potential for an impact from the former C&R Motors site on the subject property is low.

The Recycling Industries of Atlanta property detected various metals in soils including Barium at concentrations up to 1,770 mg/Kg and Lead to 843 mg/Kg. Contaminants detected in groundwater include Lead (0.012 mg/L), Cadmium (0.0046 mg/L), Barium (0.09 mg/L), Tetrachloroethene (0.0281 mg/L) and Trichloroethene (0.0094 mg/L). This property is located over 0.25-mile to the west-southwest. The prevailing direction of groundwater flow in the area of the Recycling Industries of Atlanta facilities appears to be to the southeast. Therefore, the potential of an impact on the subject property is low.

The IRCC of Georgia (formerly Puritan Chemical) site had a release notification submitted to the Georgia EPD in July 1999. This facility was incorrectly identified in the database report. Its actual location is two miles north of the subject property. Various volatile and semivolatile organics were discovered in soil and groundwater at this site. In addition, Lead was identified in soil and groundwater. The suspected source of Lead was the adjacent Seitzinger site, a former Lead smelter. The maximum concentration of Lead in soil was 3,820 mg/Kg and 19.1 mg/L in groundwater. Various chlorinated hydrocarbons were detected in soils and groundwater, including Vinyl Chloride. The Georgia EPD evaluated the release using the Reportable Quantity Screening Method (RQSM). The RQSM on-site (soils) pathway score was determined to be zero (0) and the groundwater pathway score was 8.13. The RQSM thresholds for including a site on the Hazardous Site Inventory are ten (10) for the groundwater pathway and twenty (20) for the on-site or soils pathway. Although the release notification did not identify the direction of groundwater flow at the former Puritan Chemical site, ETRI has personal knowledge that the direction of groundwater flow at the adjacent Seitzinger site is to the west. Given its cross gradient topographic relationship, the potential for an impact on the subject property is low.

The three remaining non-HSI sites are located over 0.5-mile from the subject property. These sites are located topographically cross gradient or down gradient to the subject property. Therefore, the probability of an impact on the subject property is low.

#### **5.2.5 State Registered Underground Storage Tank (UST) List**

The Georgia Department of Natural Resources, Environmental Protection Division maintains a database of registered Underground Storage Tanks (USTs). This database was reviewed to identify registered UST facilities within 0.25 mile radius of the Site. Three registered UST facilities were identified within the 0.25 mile radius of the Site. The subject property was one of the registered UST sites that were identified. The following is a listing of the registered UST sites and their distance and topographic positions relative to the subject property.

Three registered UST sites and eight LUST facilities were identified within the specified radii. The subject property was identified as a registered UST and LUST site. The following is a listing of the registered UST and LUST sites and their distance and topographic positions relative to the subject property.

#### Registered Underground Storage Tanks Sites

Map ID		
#A1	Facility Name: Address: Distance/Direction:	Harmon Brothers Charter Service 1160 Allene Ave. Subject Property
#4	Facility Name: Address: Distance/Direction: Topographical Relationship:	Sprint Communications Company 1190 Allene Ave. Adjacent Property, south Down gradient
#C8	Facility Name: Address: Distance/Direction: Topographical Relationship:	Champion International Corp. 840 Woodrow Street Between 1/8 and 1/4 mile west-northwest Up gradient

Further discussion regarding the underground storage tanks at the Harmon Brothers site is provided in the next section.

#### **5.2.7 State Leaking Underground Storage Tank (LUST) List**

The Georgia Department of Natural Resources, Environmental Protection Division maintains a database of LUST sites. This database was reviewed to identify LUST facilities within a 0.5-mile radius of the subject property. Ten LUST facilities were identified within the 0.5 mile radius of the Site. The subject property was one of the LUST sites that were identified. The following is a listing of the LUST sites and their distance and topographic positions relative to the subject property.

#### Leaking Underground Storage Tanks Sites

Map ID		
#A2	Facility Name: Address: Distance/Direction:	Harmon Brothers Charter Service 1160 Allene Ave. Subject Property
#C9	Facility Name: Address: Distance/Direction: Topographical Relationship:	Champion International Corp. 840 Woodrow Street 715 feet, west-northwest Up gradient
#16	Facility Name: Address: Distance/Direction: Topographical Relationship:	Jupiter Development 1163 Metropolitan Parkway 1,712 feet, east Down gradient
#E19	Facility Name: Address:	Former C&R Motors 1318 Sylvan Road

	Distance/Direction:	2,037 feet, southwest
	Topographical Relationship:	Down gradient
#22	Facility Name:	Alterman Cold Storage
	Address:	933 Lee Street
	Distance/Direction:	2,268 feet, north-northwest
	Topographical Relationship:	Cross gradient
#23	Facility Name:	Alterman Cold Storage
	Address:	948 Donnelly Avenue
	Distance/Direction:	2,311 feet, northwest
	Topographical Relationship:	Cross gradient
#24	Facility Name:	Georgia Building Authority
	Address:	1150 Murphy Avenue
	Distance/Direction:	2,324 feet, west
	Topographical Relationship:	Cross gradient
#25	Facility Name:	Doc's Auto Repair
	Address:	1131 Lee Street
	Distance/Direction:	2,328 feet, west
	Topographical Relationship:	Cross gradient
#F27	Facility Name:	BookWorld USA LLC
	Address:	923 Lee Street
	Distance/Direction:	2,547 feet, north-northwest
	Topographical Relationship:	Cross gradient
#28	Facility Name:	Fire Station #20
	Address:	590 Manford Road
	Distance/Direction:	2,609 feet, southeast
	Topographical Relationship:	Down gradient

As noted, the subject property is listed as a registered UST and LUST site. The Harmon Brothers facility is registered as having a 10,000-gallon diesel, 4,000-gallon gasoline and 2,000-gallon gasoline and a 1,000-gallon kerosene underground storage tanks. The 4,000-gallon, 2,000-gallon and 1,000-gallon UST's were removed in 1998. The 4,000-gallon gasoline UST was located on the southwest corner of the shop building and the 2,000-gallon gasoline and 1,000-gallon kerosene UST were located north of the office building.

During the tank closure, soil samples detected the presence of contamination in the area of each of the UST's. The Georgia EPD requested the completion of a Corrective Action Plan Part A. The CAP Part A was prepared and submitted to the Georgia EPD on April 5, 2006. Three monitoring wells were installed as part of the CAP Part A. One well (MW-3) was installed in the area of the 1,000-gallon kerosene and 2,000-gallon gasoline UST's on the north side of the property. Another monitoring well (MW-1) was installed west of the shop area where the 4,000-gallon gasoline UST was located and the third well (MW-2) was located on the southeast side of the property. Groundwater was determined to be located at a depth of 16 to 31 feet below ground surface. The direction of groundwater flow was determined to be to the east-northeast. Low concentrations of **Benzene** were

detected in two monitoring wells located to the east and west of the shop area. The concentration of Benzene in MW-1 was determined to be 2.2 ug/L and 1.7 ug/L in MW-2. No BTEX was detected in MW-3 on the north side of the property. No polynuclear aromatic hydrocarbons were detected in any of the monitoring wells. Based on the results of the investigations, the Georgia EPD issued a no further action letter for this release on April 18, 2006. Pertinent information related to the CAP Part A and the no further action letter are included in Appendix F.

The 10,000-gallon diesel UST remains on the property. Given that the tank is no longer in use, the UST system should be closed in accordance with Georgia Underground Storage Tank Management Program (USTMP) guidelines.

In order to obtain further understanding of the potential impact of the other LUST sites located within 0.25-mile from the subject property, ETRI conducted additional research at the Georgia EPD-Underground Storage Tank Management office.

Investigations were completed at the Champion International facility in 1988. The investigations determined that groundwater had been impacted from a release. The groundwater was impacted with Benzene along with other volatile organic constituents. Benzene was detected in one monitoring well at concentrations up to 5,238 ug/L in August 1988. A monitoring well located on the northeast side of the property (closest to the subject property) was found to have no detectable concentrations of volatile organic compounds. Based on the results of the investigations, the probability of an impact to the subject property is low.

The Jupiter Development site at 1163 Metropolitan Parkway had four suspected and one confirmed release. The confirmed release was reported to the Georgia EPD in November 1993. Based on the results of the investigations completed for the confirmed release, the Georgia EPD issued a no further action letter.

The Alterman Cold Storage facility removed two 8,000-gallon gasoline and diesel UST's and a 6,000-gallon gasoline UST in October 1999. A Corrective Action Plan Part A was prepared for this property in 2001. Benzene was detected in groundwater at a concentration of 46 ug/L during a semi-annual groundwater monitoring event in 2000. Groundwater was located at a depth of 10 to 14 feet below ground surface and was determined to be moving to the southwest. The furthest down gradient monitoring wells were found to have no detectable concentrations of BTEX. The Georgia EPD issued a no further action letter for this site on November 2, 2001. Based on the direction of groundwater flow and results of groundwater sampling, this LUST site would not impact the subject property.

The J&L Associates facility had a 10,000-gallon diesel and a 2,500-gallon gasoline UST removed in October 1998. Confirmation soil samples that were collected during the closure had no detectable concentrations of BTEX or polynuclear aromatic hydrocarbons (PAHs). The Georgia EPD issued a no further action letter for this site on December 5, 2001.

A release notification was issued to the Georgia EPD for the Georgia Building Authority site in August 1994. The Georgia EPD has issued a no further action letter related to the release.

Doc's Auto Repair had a release reported to the EPD in 2004. After completing groundwater

monitoring, the Georgia EPD issued a no further action letter related to the release.

A release notification was issued to the Georgia EPD for the BookWorld LUST site in May 1996. A groundwater monitoring report from April 2003 was reviewed by ETRI. Benzene has been detected in groundwater at concentrations as high as 10,300 ug/L. The direction of groundwater flow has been determined to be to the north-northeast. A monitoring well located on the southeast side of this property was found to have a Benzene concentration of 38 ug/L. The Georgia EPD issued a no further action letter for this release on January 26, 2004. The probability of an impact on the subject property is low.

The Fire Station had a release notification submitted to the Georgia EPD in June 1999. Based on the results of investigations completed related to the release, the Georgia EPD has issued a no further action letter for the Fire Station site.

Based on information obtained from file reviews and the locations of the LUST sites, the probability of an impact from the LUST sites is low.

#### **5.2.7 Brownfield's Sites**

The database of Brownfield's sites is a public record where response actions under the Georgia Hazardous Site Reuse and Redevelopment Act are planned, ongoing or completed. The search for Brownfield's sites is a 0.5-mile radius of the subject property. One Brownfield's site was identified within 0.5-mile. One Brownfield's site was identified within 0.5-mile. The Unpaint Corporation property, located at 920 Murphy Avenue, was identified as a Brownfield's site. This property is located approximately 2,439 feet to the north. This property is listed as having residential use. The Brownfield's was issued for this site on June 8, 2005. Response actions have been completed at this site.

#### **5.2.8 Unmappable (Orphan) Sites**

A list of orphan or unmapped sites was also reviewed. These sites are identified but not plotted due to insufficient address information. One state hazardous waste site (HSI), one non-HSI site, two Brownfield's sites, eleven (11) solid waste landfills and five ERNS sites were identified as orphan sites. The orphan state hazardous waste site is the Woodall Creek site located at the 1400 block of Ellsworth Industrial Boulevard. The Woodall Creek site is located over four miles to the north. The orphan non-HSI site is the Commercial Properties site a 1239, 1229 and 1225 Allene Avenue. The Commercial Properties non-HSI site is located approximately 500 feet to the south. ETRI attempted to review the file for this site at the Georgia EPD - Hazardous Sites Response Program offices. Unfortunately, the file for this property could not be located and no backup files for the property have been prepared. The database report indicates that a release notification was made as a result of a release of Barium above the notification concentration. If groundwater were impacted with Barium, it would be flowing to the east-northeast. The potential for an impact would be low.

The orphan ERNS sites area located on I-20 eastbound (2), I-20 east at Holmes station, I-285 South and at 150 North Avenue. None of the orphan ERNS sites are located within one-mile of the subject property. The orphan Brownfield's sites include the 3 & 5 Peachtree Avenue property and the

proposed Lowe's on Georgia Highway 85. Neither of these properties are located within one-mile of the subject property. None of the orphan solid waste landfill sites are located within 0.25-miles of the subject property. Based on the locations of the orphan sites from the subject property, the probability of an impact on the subject property is low.

## **6.0 RECONNAISSANCE FINDINGS**

### **6.1 Site Reconnaissance**

Mr. Thomas R. Harper of ETRI conducted a site visit on February 5, 2009 to obtain information for the Phase I Environmental Site Assessment. ETRI was unaccompanied during the site reconnaissance. The purpose of the Site inspection was to identify any recognized environmental conditions associated with the property. The inspection included a walk through of the entire property.

#### **6.1.1 Observations Made of the Surrounding Land**

The areas west and northwest of the office and truck service building area is paved with asphalt and concrete. A concrete paved area is also located on the southwest side of the property. The northern and eastern sides of the property were used to store old busses, bus parts and tires. The entire property is enclosed with a wire fence. The gate at Allene Avenue was open at the time of the Site inspection.

An abandoned trailer is located on the northern side of the property. The trailer is being used to store wood and cardboard.

A 10,000-gallon double walled, cathodically protected underground storage tank is used to store diesel fuel. The UST and dispenser are located on the southern side of the property. A large area of petroleum stained soil was noted in the area of the fuel dispenser. Other areas of petroleum stained soil was noted on the southeast side of the property. Three tanks that were formerly used to store diesel and gasoline were removed in 1998.

Several areas were identified where petroleum product releases have occurred. The largest and most obvious area of spills is evident in the area of the diesel fuel dispenser. Stained soil is located around the dispenser and has also migrated to a low lying area east-southeast of the dispenser. Other areas of petroleum stained soil were noted on the southeast and southwest sides of the property where containers of oil have been stored or servicing of vehicles has been conducted. In 2006, investigations were completed by ETRI and Mactec to delineate the extent of soil contamination in this area of the Site.

Two pole-mounted transformers are located on the south side of the property. The transformers are located on a single telephone pole just southeast of the bus maintenance building. No labels are present on the transformers that would indicate if they contain PCBs. Inspection of the outside of the transformers and the surrounding area did not identify evidence of oil staining or stressed vegetation which could be an indication of a leaking transformer. It should be noted that as the owner of the transformers, Georgia Power would be responsible for the environmental cleanup of areas impacted by releases of transformer dielectric fluid.

#### **6.1.2 Observations Made of the Building Interiors**

As noted, the property is developed with an approximate 2,800 square feet office building and an adjoining two-bay drive through bus maintenance building. Two abandoned truck service buildings are located north of the office building. The office building is a concrete block building constructed on a concrete slab. The front (west) side of the building is finished with a brick exterior. The building has



a flat roof supported by steel or wood trusses.

The interior of the building is finished with wood panel and sheet rock walls, suspended ceilings and 9-inch by 9-inch and 12-inch by 12-inch vinyl floor tile. The office area is illuminated with fluorescent light fixtures.

The bus service facility is a concrete block structure constructed in the early 1940's. The structure has a flat roof with wood trusses and wood decking. The building has two drive-through service bays. One of the service bays has a pit for servicing vehicles. Each service bay has a roll-up garage door to provide access. An office area and a parts storage area are located in the building. A mezzanine area is located above the office for storage. The interior of the bus maintenance building has painted concrete block walls, bare concrete floors and the ceiling is open to the roof trusses. The office area has bare concrete floors and the storage area is finished with 9-inch by 9-inch vinyl floor tiles.

The south side of the bus service facility has an overhanging roof. This area is currently used for cleaning and fueling of the busses. The overhanging roof is constructed of sheet metal. The area beneath the overhanging roof is paved with concrete. A 10,000-gallon underground storage tank and dispenser are used to store/dispense of diesel for the busses.

Two service garage buildings are located north of the office area. Both of the buildings are in poor condition. The northern most building is a concrete block structure with one service bay and a flat roof with wood trusses and wood decking. The second building is connected to the northern side of the office building. This is a concrete block structure constructed on a concrete slab with a flat roof. This building has two service bays and one of the service bays has a pit.

## 6.2 Summary of Possible Recognized Environmental Conditions

A summary of identified uses and conditions consistent with ASTM indicating possible recognized environmental conditions in connection with the property is provided below. For each of the uses or conditions identified on the subject property, detailed information is discussed following the summary or in previous sections of this report. An opinion of the significance of the finding with regards to recognized environmental conditions in connection with the subject property is also discussed.

<i>Identified?</i>		<i>Recognized Environmental Condition</i>
<i>Yes</i>	<i>No</i>	
	X	Hazardous Substances in Connection With Property Use
X		Petroleum Products in Connection With Property Use
X		Aboveground or Underground Storage Tanks (ASTs/USTs)
	X	Suspect Containers Not in Connection With Property Use
X		Electrical or Mechanical Equipment Likely to Contain PCBs
	X	Interior Stains or Corrosion
	X	Drains or Sumps
	X	Wastewater and/or Stormwater Discharges

		X	Septic or Sewage Tanks
		X	Pits, Ponds or Lagoons
		X	Pools of Liquid or Standing Water
		X	Solid Waste Dumping, Landfills or Suspect Fill Material
X			Stained Soil or Pavement
		X	Stressed Vegetation
X			Wells
		X	Pesticide Use
		X	Other Uses or Conditions of Concern

#### 6.2.1 Petroleum Products in Connection with Property Use

Harmon Brothers operated a bus servicing facility at this location. Spills of petroleum products are evident in the area surrounding the shop and fuel dispenser. A below ground diesel storage tank and what appears to be a waste oil tank is located on the property. Further discussion about the soil staining and underground storage tank is presented below.

#### 6.2.2 Aboveground or Underground Storage Tanks (ASTs/USTs)

A visual inspection was undertaken to locate any above ground storage tanks (ASTs) or underground storage tanks (USTs) on the subject property. Evidence of USTs including vent pipes, fill pipes, concrete pads, and access ways was investigated. One 10,000-gallon underground storage tank is located on the south side of the property. The tank is used to store diesel fuel. A single dispenser is located east of the UST. The UST is a double walled steel tank that was installed in 1974. A cathodic protection system is used to minimize corrosion of the tank. A spill prevention and overfill protection system was installed in 1995. The Georgia Environmental Protection Division (EPD) had issued a Notice of Violation related to the non-compliance for periodic tank tightness testing and cathodic protection system inspections. A tank tightness test was completed on September 1, 2005. A Cathodic Protection System Evaluation was completed in January 2006. The tank tightness test and cathodic protection system evaluation determined that the tank passed the tests.

As possible waste oil tank is also located between the outside canopy and main service building. The tank is not registered and the size and construction of the tank are unknown.

This property formerly had a 4,000-gallon gasoline and 2,000-gallon gasoline and a 1,000-gallon kerosene underground storage tanks. The 4,000-gallon, 2,000-gallon and 1,000-gallon UST's were removed in 1998. According to Mr. Clint Harmon, the 4,000-gallon gasoline UST was located on the southwest corner of the shop building and the 2,000-gallon gasoline and 1,000-gallon kerosene UST were located north of the office building. Soil samples detected the presence of contamination in the area of each of the UST's.

#### 6.2.3 Electrical or Mechanical Equipment Likely to Contain PCBs

Two pole-mounted transformers are located on the south side of the property. The transformers are

located on a single telephone pole just southeast of the bus maintenance building. No labels are present on the transformers that would indicate if they contain PCBs. Inspection of the outside of the transformers and the surrounding area did not identify evidence of oil staining or stressed vegetation which could be an indication of a leaking transformer. It should be noted that as the owner of the transformers, Georgia Power would be responsible for the environmental cleanup of areas impacted by releases of transformer dielectric fluid.

The interior of the office and bus maintenance buildings are illuminated with fluorescent light fixtures. It is possible that the ballasts for the fluorescent light fixtures contain PCBs. If the light fixtures are removed, the ballasts should be inspected for the presence of PCBs. The non-PCB ballasts will have a label identifying it as such. If found to contain PCBs, the ballasts should be disposed of properly.

#### **6.2.4 Stained Soil or Pavement**

Spills of diesel fuel identified in the area of the fuel dispenser and other smaller areas around the service garage. Additional investigations were completed to define the extent of the soil contamination. ETRI estimated that approximately 48 cubic yards of soil in the area of the dispenser have levels of total petroleum hydrocarbons – diesel range organics at concentrations greater than 100 mg/Kg. The petroleum impacted soil should be excavated and disposed of properly.

#### **6.2.5 Wells**

Three groundwater monitoring wells exist on the property. The monitoring wells were installed as part of investigations related to a former tank closure project. The wells should be properly abandoned prior to site redevelopment.

### **6.3 Adjoining Property Reconnaissance Findings**

The adjacent property land usage includes a telecommunications operations building, vacant warehouse building, a towing company, vacant office-warehouse building an automotive service facility, a former tire re-treading facility and single-family homes. The following summarizes the adjacent property usage:

**North** – The adjacent property to the north is a vacant warehouse building. This building was historically used by a company that manufactured wooden crates used in the produce industry.

**South** – A Sprint Telecommunications facility is located on the adjacent property to the south.

**East** – A rail line is located east and northeast of the subject property. It is not known whether the rail line continues to be an active line for the railroad. Northeast of the rail line are single-family homes.

**West** – Allene Avenue, a two-lane asphalt paved road borders the subject property to the west. West of Allene Avenue, the adjacent properties include JB Towing, a vacant auto service facility and a former Kelly Tire Re-treading facility.

The adjacent properties to the west and northwest are topographically up gradient to the subject property. The adjacent properties to the east and south would be considered to be topographically down gradient. Adjacent properties to the north are cross gradient.

A summary of uses and conditions identified on adjoining properties consistent with ASTM Standards indicating the possibility of recognized environmental conditions in connection with the subject property is provided below. For each of the uses or conditions identified on adjoining properties, detailed information is discussed following the summary. An opinion of the significance of the finding with regards to recognized environmental conditions in connection with the subject property is also discussed.

<i>Identified?</i>		<i>Recognized Environmental Condition</i>
<i>Yes</i>	<i>No</i>	
	X	Hazardous Substances in Connection With Adjoining Property Use
X		Petroleum Products in Connection With Adjoining Property Use
	X	Aboveground or Underground Storage Tanks (ASTs/USTs)
	X	Suspect Containers
	X	Electrical or Mechanical Equipment Likely to Contain PCBs
	X	Stains or Corrosion on Interior of Facility
	X	Drains or Sumps
	X	Wastewater and Stormwater Discharges
	X	Septic or Sewage Tanks
	X	Pits, Ponds or Lagoons
	X	Pools of Liquid or Standing Water
	X	Solid Waste Dumping, Landfills or Suspect Fill Material
	X	Stained Soil or Pavement
	X	Stressed Vegetation
	X	Wells (visible evidence only)
	X	Pesticide Use
	X	Other Uses or Conditions of Concern

### 6.3.1 Petroleum Products in Connection With Adjoining Property Use

The adjacent automotive JB Towing and former Tire re-treading facilities likely used petroleum products in their operations. No confirmed releases have been identified on the adjacent properties to the west and northwest, the current and past operations could have an impact on the groundwater on the Warner Street property.

## 8.0 PHASE I CONCLUSIONS AND RECOMMENDATIONS

### 8.1 Deviations From ASTM Standards

This report was prepared in general accordance with the ASTM Standards. There are no deviations from the standards.

### 8.2 Findings and Conclusions

The following sections present ETRI's findings and conclusions regarding *de minimis* conditions, historical recognized environmental conditions, and recognized environmental conditions identified at the subject property during the course of this Phase I ESA.

#### 8.2.1 De Minimis Conditions

*De minimis* conditions are conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of the appropriate government agencies. These conditions may be items that can be addressed through general housekeeping practices. No *de minimis* conditions were identified during ETRI's site reconnaissance.

#### 8.2.2 Historical Recognized Environmental Conditions

The term historical recognized environmental condition means an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a current recognized environmental condition. If a past release of a hazardous substance or petroleum products has occurred in connection with the property and has been remediated, with such remediation accepted by a responsible regulatory agency, this condition shall be considered a historical recognized environmental condition.

Based upon the information obtained during our assessment and our observations, ETRI believes that historical recognized environmental conditions exist at the subject property. Inspection of the property identified areas of petroleum impacted soils. The petroleum impacted soil was identified during the initial Phase I ESA in 2006. A limited Phase II ESA determined that groundwater in a monitoring well contains Cyclohexane and methylcyclohexane. Groundwater in another monitoring well was found to contain Chloroform. The soil and groundwater contamination represents historical environmental conditions.

#### 8.2.3 Recognized Environmental Conditions

The term recognized environmental condition means the presence or likely presence of a hazardous substance or petroleum on the property under conditions that indicated an existing release, a past release, or material threat of a release of hazardous substances or petroleum products into the structures of the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public

## **9.0 WARRANTY**

### **9.1 Phase I Environmental Site Assessment**

This update Phase I ESA is based on the conditions existing at the Site during ETRI's visit on February 5, 2009. Results of the update Phase I ESA are based on information provided to ETRI, or which were reasonably available to ETRI from records, interviews and recollections. Specifically, various sections in the report, which rely on historical information, based on interviews, is limited to the information gained from interviewing property management personnel and/or local officials.

This report is based on the current regulatory environment and current fully implemented regulations and deals only with the due diligence required of law for pre-acquisitional investigation relating to CERCLA contamination on the Site. Future regulatory modifications, agency interpretations, and/or attitude changes may affect the compliance status of the Site.

ETRI cannot comment on actual conditions of adjacent properties or, if the activities of adjacent properties have affected the subject site without further investigation. ETRI's review of various database information relative to adjacent properties was obtained from publicly available sources and other secondary sources of information produced by entities other than ETRI. Due to the dynamic nature of such database reports, various facilities are not contained within the database and subsequently do not appear on the computer generated Site maps. ETRI augments the database review with interview information, as appropriate, and reconnaissance activities of the general area. In doing so, ETRI has applied best technical and scientific judgment within the allotted time and economic parameters of this assignment.

The assessment was performed in accordance with generally accepted practices of the profession undertaking similar studies at the same time and in the same geographical area. ETRI exercised these practices during the aforementioned Phase I evaluation. No other warranty is expressed or implied. The recommendations provided in this report do not constitute legal advice and should not be relied upon in any way for legal interpretations.

### **9.2 Unidentifiable Conditions**

There is a possibility that even with proper application of these methodologies, conditions may exist on the subject property that could not be identified within the scope of the assessment or that were not reasonably identifiable from the available information. ETRI believes that the information obtained from the records review and the interviews concerning the subject property is reliable. However, ETRI cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide the client with information regarding apparent suspicions of existing and potential adverse environmental conditions relating to the subject property.

No other warranties are implied or expressed.

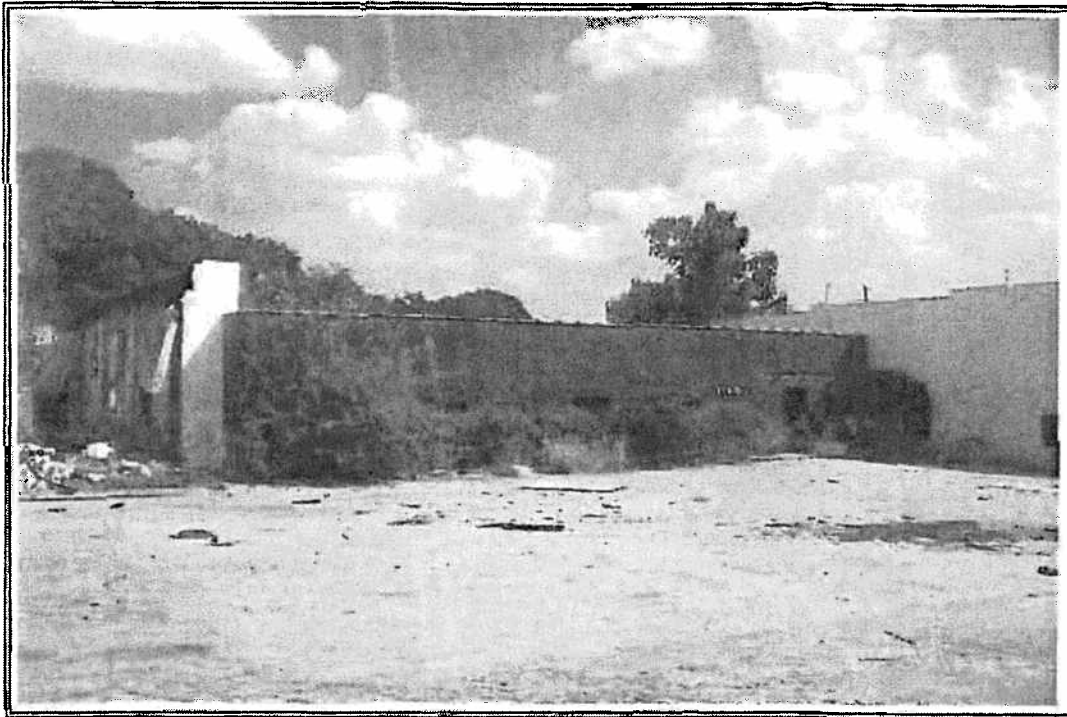
## 11.0 REFERENCES

1. Geologic Map of Georgia, Georgia Department of Natural Resources, (1976).
2. *Soil Survey of Fulton County, Georgia*, U. S. Department of Agriculture, Soil Conservation Service, (1958).
3. Cressler, C.W., C.J. Thurmond, and W.G. Hester: *Information Circular 63: Ground Water in the Greater Atlanta Region, Georgia*. Georgia Geologic Survey (1983).
4. Howard, J.H.: *Studies of Saprolite and its Relation to the Migration and Occurrence of Groundwater in Crystalline Rocks*. Atlanta, GA. Environmental Resources Center, Georgia Institute of Technology (1973).
5. University of Georgia - Department of Geology, *The Geology of Georgia*, (<http://www.gly.uga.edu/railsback/GAGeology.html>)
6. Leeth, David C., *Groundwater Conditions in Georgia*, U.S. Geological Survey (2003).

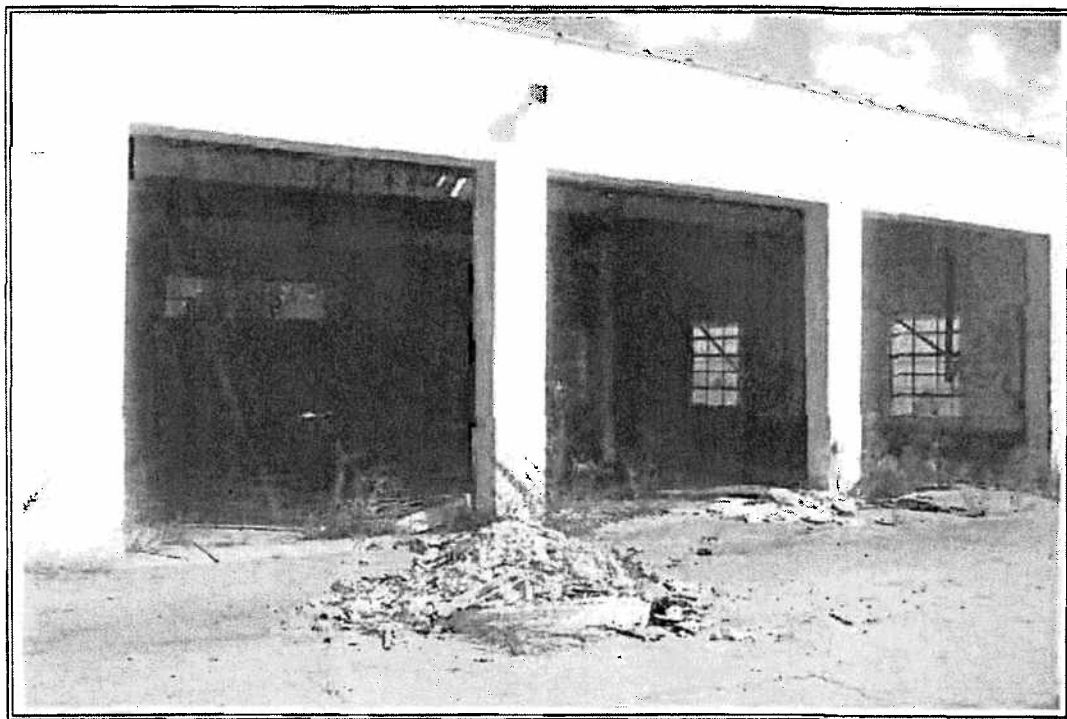
APPENDIX A - PHOTOGRAPHS

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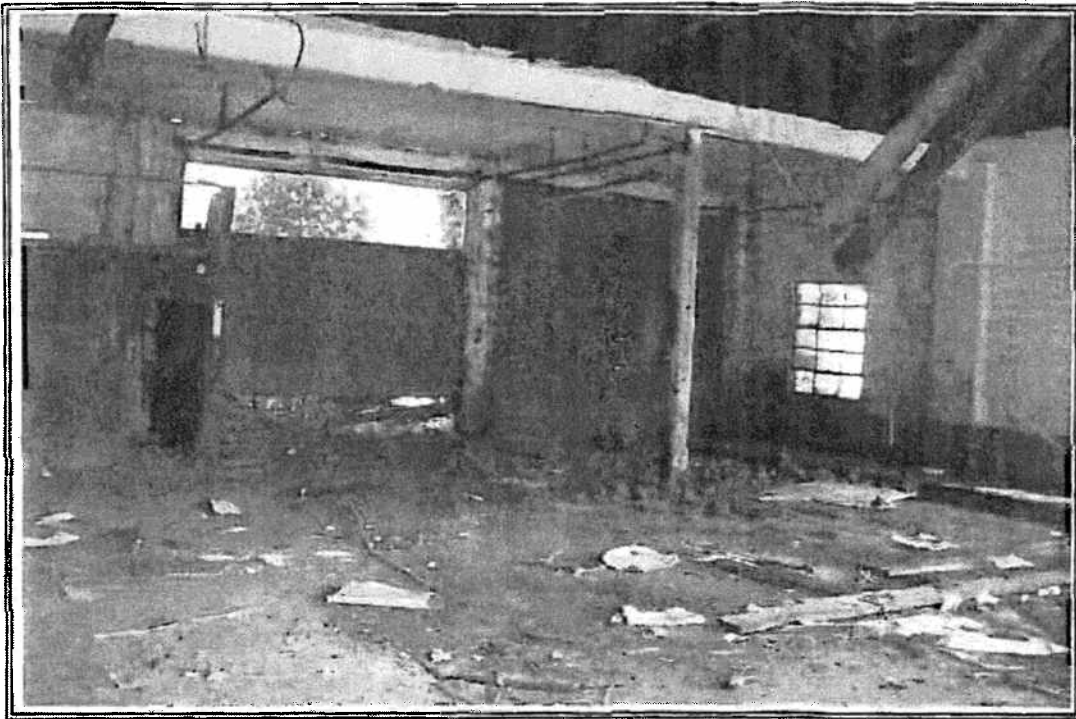
View of Former Office for Harmon Brothers



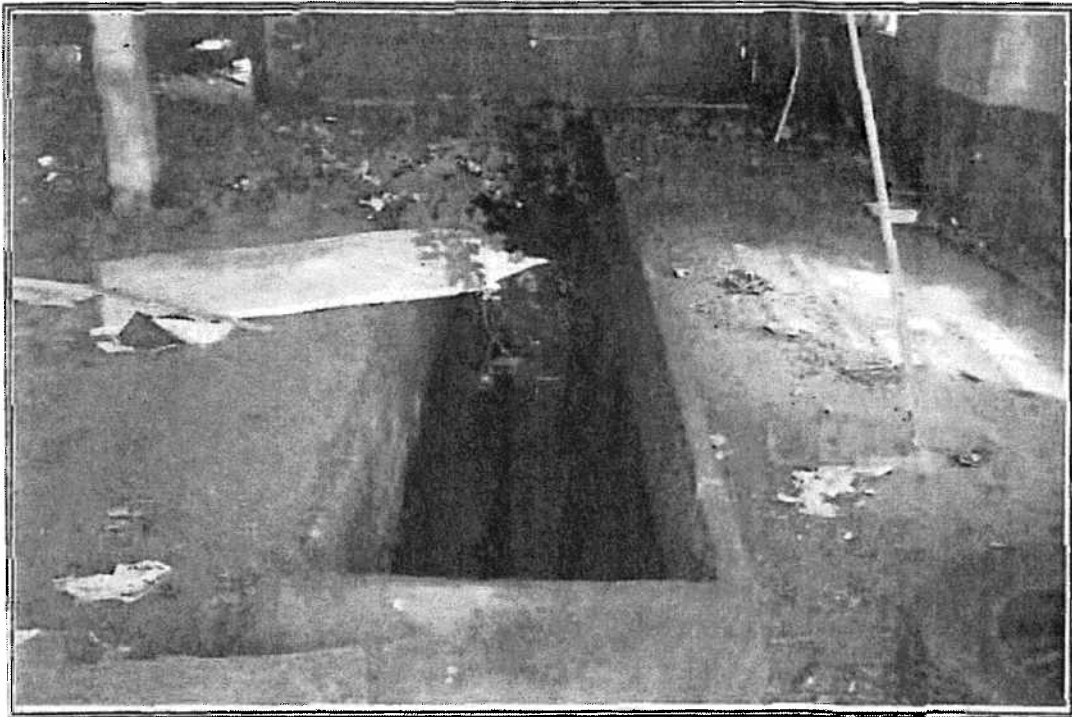
View of Bus and Truck Service Garage

Site Photographs - Atlanta, Georgia  
Project Name: 1160 Allene Avenue  
Project Number: 06-092

Environmental Technology Resources, Inc.  
4780 Ashford Dunwoody Rd. Suite A-456  
Atlanta, Georgia 30338



View Inside of Former Bus/Truck Service Garage



Pit Located in Service Bay

Site Photographs - Atlanta, Georgia  
Project Name: 1160 Allene Avenue  
Project Number: 06-092

Environmental Technology Resources, Inc.  
4780 Ashford Dunwoody Rd. Suite A-456  
Atlanta, Georgia 30338



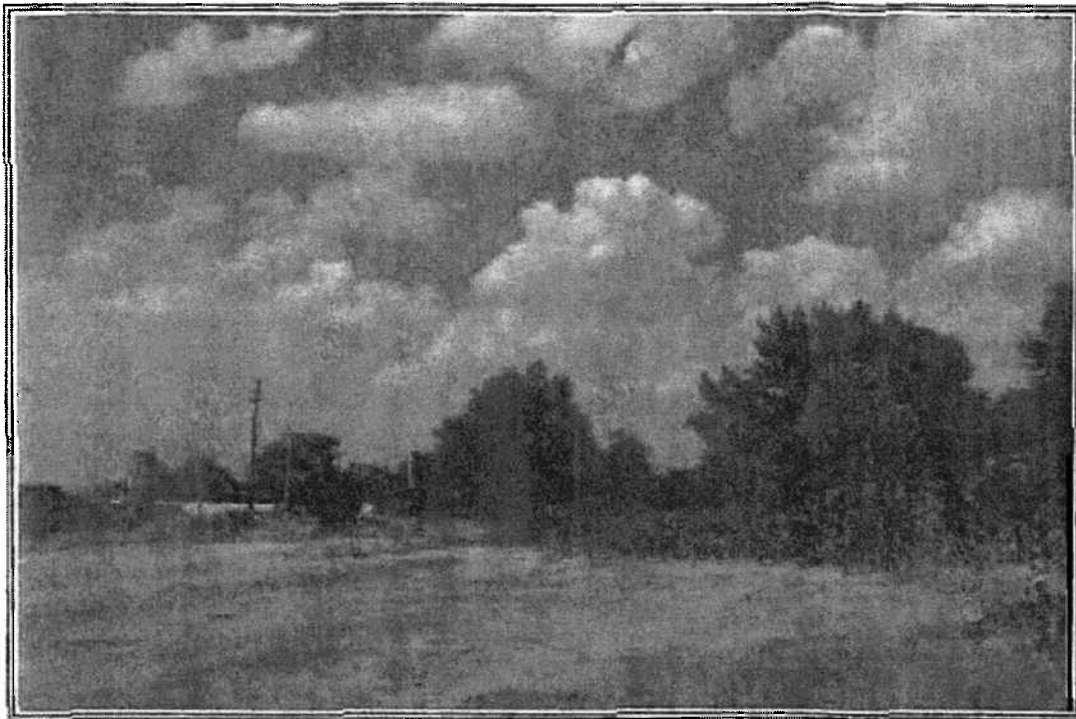
Covered Service Bay Area Adjacent to South Side of Building



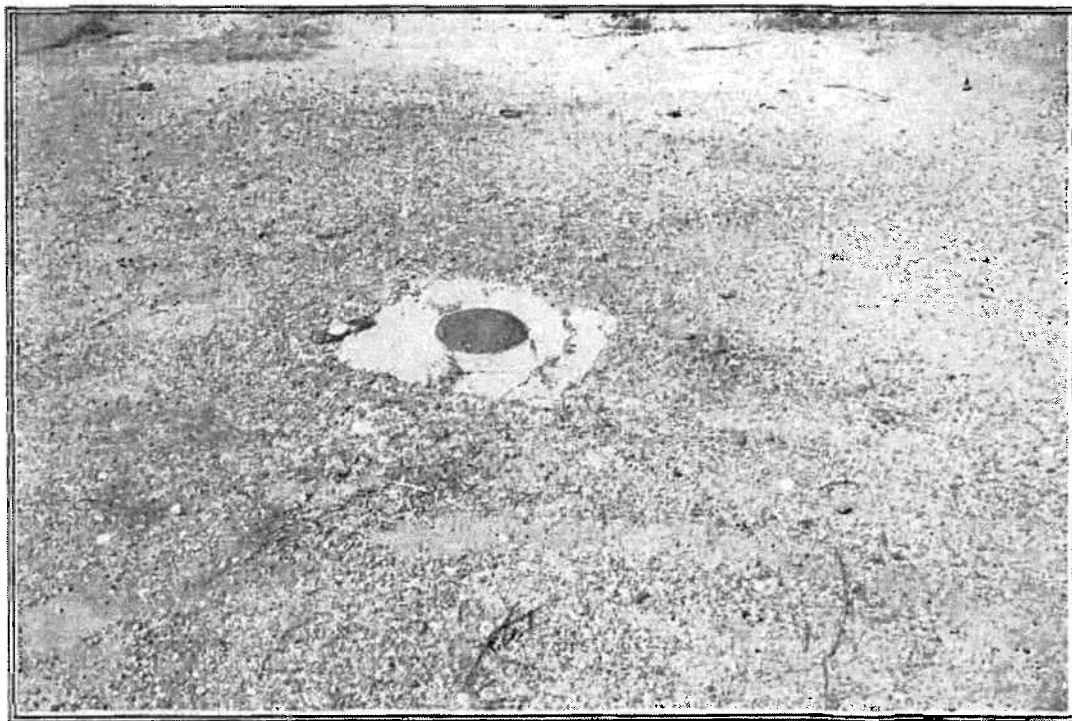
View of Diesel Underground Storage Tank Located on South Side of Property

Site Photographs - Atlanta, Georgia  
Project Name: 1160 Allene Avenue  
Project Number: 06-092

Environmental Technology Resources, Inc.  
4780 Ashford Dunwoody Rd. Suite A-456  
Atlanta, Georgia 30338



View of Northern Side of Property



Groundwater Monitoring Well Located on North Side of Property

Site Photographs - Atlanta, Georgia  
Project Name: 1160 Allene Avenue  
Project Number: 06-092

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4780 Ashford Dunwoody Rd. Suite A-456  
Atlanta, Georgia 30338